

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	§ Chapter 11 Case
	§
Old LC, Inc., <i>et al.</i> <sup>1</sup>	§ Case No. 19-11791 (BLS)
	§
Debtors.	§ Jointly Administered

Official Committee of Unsecured Creditors  
of Old LC, Inc., et al., for and on behalf of  
the estates of Old LC, Inc., *et al.*;

*Plaintiff,*

V.

Adv. No. 20-51002 (BLS)

Upfront V, LP, Breakwater Credit Opportunities Fund, L.P.; Upfront GP V, LLC; Mark Suster; Dana Kibler; Gregory Bettinelli; Saif Mansour; Aamir Amdani; Eric Beckman; Darrick Geant; and Joseph Kaczorowski

*Defendants.*

## CERTIFICATION OF COUNSEL

The undersigned counsel for Official Committee of Unsecured Creditors of Old LC, Inc., et al.,  
for and on behalf of the estates of Old LC, Inc., *et al.*; (the “Committee”) hereby certifies as follows:

1. On November 2, 2020, the Committee filed the complaint in the above-captioned adversary proceeding.

<sup>1</sup> The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors' noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14<sup>th</sup> Floor, Atlanta, Georgia 30309.

2. The Committee has conferred with counsel for each of the Defendants, and the parties have agreed upon a form of scheduling order, a copy of which is attached hereto as Exhibit A (the “Scheduling Order”).

3. The Committee respectfully requests that the Court enter the attached Scheduling Order at the Court’s earliest convenience.

November 23, 2020

**MORRIS JAMES LLP**

/s/ Jeffrey R. Waxman

Jeffrey R. Waxman (DE Bar No. 4159)

500 Delaware Avenue, Suite 1500

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*Counsel to the Committee*